

CECOS
INTERNATIONAL, INC.
CHEMICAL AND ENVIRONMENTAL CONSERVATION SYSTEMS

Niagara Falls Blvd. and Walmore Road
Niagara Falls, New York
716/731-3281

Address Correspondence To:
Post Office Box 619
Niagara Falls, New York 14302

February 19, 1982

Karim Rimawi, Ph.D. Director
Bureau of Environmental Radiation Protection
New York State Department of Health
Tower Building, Room 1750
Empire State Plaza
Albany, NY 12237

Re: NYSDEC Permit #2581
Slag Control

Dear Dr. Rimawi:

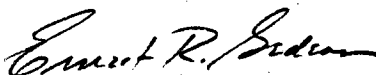
This letter will confirm our telephone conversation of February 19, 1982 regarding the control of the metallurgical slag located at the CECOS International, Inc. solid waste management site in Niagara Falls, NY.

I was surprised to learn that you had not received a copy of the NYSDEC Permit #2581 which was issued on October 27, 1982 and contained Special Conditions for use, transfer and removal of the slag. I have included a copy of the permit for your records.

I was pleased to learn that you and Mr. O'Brian had discussed the situation and you both felt that the concerns of the Health Department are resolved by the NYSDEC permit requirements. Further, that you will provide CECOS with written verification of your department's concurrence within the next two (2) weeks and no further action is contemplated in this matter by the NYS Department of Health.

Please let me know if I can furnish any additional information.

Yours very truly,



Ernest R. Gedeon, Corporate Director
Health, Safety & Environmental Control

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Enclosure

cc W. O'Brien, NYSDH, Buffalo

RECEIVED

FEB 22 1982

BUR of ENV RADIATION

2581

EXPIRATION DATE

October 27, 1982

PERMIT

Under the Environmental Conservation Law, Article 27, Title 7, Part 360

☐ CONSTRUCTION☐ INITIAL ISSUE☐ REISSUANCE☒ OPERATION☐ RENEWAL☒ MODIFICATION

PERMIT ISSUED TO See Below		ADDRESS OF PERMITTEE See Below		TELEPHONE NO.
LOCATION OF PROJECT Town Niagara and City of Niagara Falls		County Niagara	Environmental Conservation Regional Office Buffalo - Region 9	
DESCRIPTION OF PROJECT Pine Avenue/Packard Road Solid Waste Management Facility			ON-SITE SUPERVISOR Ernest R. Gedeon	

GENERAL CONDITIONS

1. The permittee shall file in the office of the Environmental Conservation Region specified above, a notice on intention to commence work at least 48 hours in advance of the time of commencement and shall also notify said office promptly in writing of the completion of the work.
2. The permitted work shall be subject to inspection by an authorized representative of the Department of Environmental Conservation who may order the work suspended if the public interest so requires.
3. As a condition of the issuance of this permit, the applicant has accepted expressly, by the execution of the application, the full legal responsibility for all damages, direct or indirect, of whatever nature, and by whomever suffered, arising out of the project described herein and has agreed to indemnify and save harmless the State from suits, actions, damages and costs of every name and description resulting from the said project.
4. All work carried out under this permit shall conform to the approved plans and specifications. Any amendments must be approved by the Department of Environmental Conservation prior to their implementation.
5. The permittee is responsible for obtaining any other permits, approvals, easements and rights-of-way which may be required for this project.
6. By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with Part 360 and the special conditions. Any variances granted by the Department of Environmental Conservation to Part 360 must be in writing and attached hereto.

~~SPECIAL CONDITIONS~~

Modification of Permit #2025, issued to:

Niagara Recycling, Inc. - 1300 Military Road, Kenmore, New York 14217

CECOS International, Inc. - Walmore Road and Niagara Falls Boulevard, Niagara Falls, New York 14302
(formerly Newco Chemical Waste Systems, Inc.)

Newco Waste Systems, Inc. - 4626 Royal Avenue, Niagara Falls, New York 14303

SPECIAL CONDITIONS

1. Except as specifically set forth in this permit modification, the terms of permits #2025 and 2268 remain in full force and effect.
2. Material on Site

Niagara Recycling, Inc. and CECOS International, Inc., as the owners of the Pine Avenue Site and CECOS International, Inc. and Newco Waste Systems, Inc. as the operators will take such steps as may be necessary to keep the slag material on the Pine Avenue Site. Neither Niagara Recycling, Inc., nor CECOS International, Inc., nor Newco Waste Systems, Inc. shall transfer or remove the slag material from the Pine Avenue Site without the permission of the Department.

Page 1 of 2

ISSUE DATE 9/14/81	ISSUING OFFICER John L. Beecher, P.E.	SIGNATURE X John L Beecher
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PERMITTEE COPY

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3. Use of Slag

Niagara Recycling, Inc., CECOS International, Inc., and Newco Waste Systems, Inc. shall not use the slag material for any purpose not authorized by the Department, it being understood that the slag may be used on-site only for the construction of roads and containment berm in landburial facilities, provided that the radioactive concentration does not exceed the permissible dose in noncontrolled areas or the permissible occupational dose as set forth in Chapter 1 of the State Sanitary Code, Part 16 ("Part 16").

4. Safety

Niagara Recycling, Inc., CECOS International, Inc., and Newco Waste Systems, Inc. shall make every effort to maintain radiation exposures and releases of radioactive materials as far below the limits set forth in Part 16 as is reasonably achievable and shall monitor construction to insure that any slag transfer on-site does not result in increased concentration due to cumulative effects as a result of the placement of the slag. Niagara Recycling, Inc., CECOS International, Inc., and Newco Waste Systems, Inc. shall conduct periodic surveys during construction of the berms to assure that the radiation levels specified in Part 16 are not exceeded.

5. Notice to Department

Niagara Recycling, Inc., CECOS International, Inc., and Newco Waste Systems, Inc. shall notify the Department of the use of the slag materials and shall give notice of any sale or lease of the Pine Avenue Site or any portion thereof at least five (5) days prior to any sale or lease.

6. Compliance with Rules and Regulations

Niagara Recycling, Inc., CECOS International, Inc., and Newco Waste Systems, Inc. shall comply with applicable provisions of Chapter I of the New York State Sanitary Code, Part 16 and such other rules and regulations of the Department as may be applicable, and shall afford to the Department reasonable access to the Pine Avenue Site for its authorized personnel, for the purpose of assuring compliance with the terms and provisions of this Agreement.

7. Miscellaneous

Nothing contained herein shall be construed as constituting a license to either Niagara Recycling, Inc., CECOS International, Inc., and Newco Waste Systems, Inc. for the possession or use of any radioactive material.

NOTICE OF PERMIT

for:

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CONSTRUCTION

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INITIAL ISSUE

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OPERATION

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RENEWAL

has been issued to: Niagara Recycling, Inc., CECOS International, Inc.,

address:

Niagara Recycling, Inc. - 1300 Military Road, Kenmore, New York 14217
CECOS International, Inc. - Walmore Road and Niagara Falls Boulevard, Niagara Falls, New York 14303
Newco Waste Systems, Inc. - 4626 Royal Avenue, Niagara Falls, New York 14303

for a project described as: Pine Avenue/Packard Road Solid Waste Management Facility

under the Environmental Conservation Law,
Article 27, Title 5, Part 360 (Solid Waste Management Facilities)

NOTE:

- This Notice of Permit must be posted on the project site in such a manner that it is protected from weather and is in a location readily visible to the public.
- A copy of the Permit with the general and special conditions noted thereon will be shown to anyone upon request.

John L. Beecher, P.E.

Issuing Officer

600 Delaware Avenue, Buffalo, New York 14203
Address

New York State
Department of Environmental Conservation

47-12-2 (8/77)

2581

Permit No.

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